

**FILED**  
UNITED STATES DISTRICT COURT  
LAS CRUCES, NEW MEXICO

OCT 23 2023

MITCHELL R. ELFERS  
CLERK OF COURT

Steven Maldonado 478191  
Full Name/Prisoner Number

10 Mc Gregor Range Rd  
Chaparral NM 88081  
Complete Mailing Address

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

Civil Action No. 23-CV-687-JB-KBM  
(To be supplied by the Court)

Steven Maldonado  
~~Management Training Corporation, Otero County~~  
~~Prison Facility, Chaplain Townson~~, Plaintiff(s),  
Full name(s) and prisoner number(s)  
(Do not use *et al.*)

v.

Management Training Corporation Otero County  
Prison Chaplain Townson, Warden Rios, EXC, Defendant(s).  
(Do not use *et al.*)

**PRISONER'S CIVIL RIGHTS COMPLAINT**

**A. PARTIES AND JURISDICTION**

1. Steven Maldonado is a citizen of New Mexico who  
(Plaintiff) (State)  
presently resides at Otero County Prison Facility  
(mailing address or place of confinement)

2. Defendant Chaplain Townson is a citizen of NM  
(name of first defendant) (State)  
whose address is 10 Mc Gregor Range Rd  
and who is employed as Otero County Prison Chaplain. At the time the claim(s)  
(title and place of employment)

alleged in this complaint arose, was this defendant acting under color of state law?  
Yes ☒ No. If your answer is "Yes," briefly explain:  
\_\_\_\_\_  
\_\_\_\_\_

3. Defendant AOL is a citizen of NM  
 (name of second defendant) (State)

whose address is ~~Case~~

and who is employed as Case Management Perole/Prob At the time the claim(s)  
 (title and place of employment)

alleged in this complaint arose, was this defendant acting under color of state law?  
 Yes No. If your answer is "Yes," briefly explain:

(If more space is needed to furnish the above information for additional defendants, continue on a blank sheet which you should label "A. PARTIES." Be sure to include each defendant's complete address and title.)

(CHECK ONE OR BOTH:)

☒ Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (for state defendants) or *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971) and 28 U.S.C. § 1331 (for federal defendants).

☒ Jurisdiction also is invoked pursuant to 28 U.S.C. § 1343(a)(3). (If you wish to assert jurisdiction under different or additional statutes, you may list them below.)

### B. NATURE OF THE CASE

BRIEFLY state the background of your case. 1. Denying a call to Law enforcement and Denying law Enforcement to talk to me  
 2. Violating my First Amendment of the U.S. Constitution;  
 #4 of the Bill of Rights and the Freedom of Religion Act  
 Violations of Probation/Perole Laws Slander Perjury.

### C. CAUSE OF ACTION

I allege that the following of my constitutional rights, privileges, or immunities have been violated and that the following facts form the basis of my allegations: (If more space is needed to explain any allegation or to list additional supporting facts, continue on a blank sheet which you should label "D. CAUSE OF ACTION.")

Claim I: Chaplain Townson is violating so many  
Inmates Religious Right And when we put in informants  
the DAs throws it out and Chaplain Townson then has officers  
and inmate molest them mentally and Theater them.

SF-1915 Leave to Proceed

## Additional Page for Item 6

on 9-12-23 Chaplain Townson told George Tyes ~~to~~ that He was go to have maria cardona and officer S. Oiesse Put a false statement to get me Steven Maldonado Put in the ~~state~~ RHU 11 And Kick me out of My Religious Class on 9-14-23 Falsly Charge me with threats Sgt Olivas To this day GI' and officer are Herassing me Putting in theating situations tampering without going legal mail taking out filing to Provent this Court from Recieving them when law Enforcement Comes to take a re Report Capt Ochoa who is A felon And ~~he~~ has many PREA's on Him and ASSlates Charges and more ~~he~~ Tell Law Enforcement we are not wanting to talk to them which is not the Case, I Sent a Subpoena to Inspection to be Filed in my last Filing if this Court has not recieved it the GI' give it to Capt Ochoa the CSO is the Sgt of the GI's which prove my deim of them Tampering with us mail a Federal Crime

State of New Mexico  
County of Dona Anna  
United States District Court  
Case# 23-CV-687-JB-KBM

Steven Maldonado

vs.

Management Training Corp,  
Otero County Prison Facility staff,  
Chaplain Townson Hector Montez Jr,  
De Torre Eder Clerk Maria Cardona, Sgt Olivas,  
Capt Ochoa. medical doctor  
violation of

Agreement to Dismiss by the  
Plaintiff AS Agreed on 8-22-23

It comes Now: I the Plaintiff is offering  
a Final Agreement. on 9-19-23 Chaplain Townson  
had my ged teacher and edu officer  
comite Slander to violat my both Rights  
#4 of the bill of Rights and the Freedom  
of Religion Act and have officer ~~Retate~~  
Retelate on me, Tempering with my  
outgoing mail.

Terms of Agreement for Violating  
the File Agreement to Dismiss  
Civil Rights Complaint on 9-12-23

I. To be able to Stat My own Religion  
which I Sent the NMCD A Proposal;

Chaplain Townson; Warden Simmon ~~Per~~ that  
is my Right to do. (Freedom of Religion Act;

The Bill of Rights.) Also to be able

to Start the Overcomer course on 10-25-23

And have Four years, To be given 42,000 dollar budgt

\$ 3000 For walkenhorsts.com orders and blick

\$14,000 to be put in my inmate Account. The

Overcomer Course will been Pan by

Myself and Enriqus Moreno ECHO

Peer Educator. this requested budgt

will be a One time Startup, The rest

of the 42,000 to be donated to ECHO.

II. Chaplain Townson to be Teme loded off

without Pay until the FBI / us Marshal's

Per the Agreement and Warden Rios

Complate thir investigation, on Chaplain

See Attached Filed order

by the us District Court

~~Term of Agreement to~~  
~~Dismiss by the Plaintiff~~

I. To be Able to Start My Support  
Group Me And Peer education <sup>Enrique</sup> ~~Enrique~~  
with ECHO <sup>Acc</sup> ~~or to~~ working on  
geting started on 10-28-23

Steven Maldonado, 73663  
Otero County Prison Facility  
10 McGregor Range Rd  
Chaparral, NM 88081



United States District Court  
District of New Mexico  
Office of the Clerk  
Cover Sheet

Date: September 22, 2023 04:15 PM MDT

To: Steven Maldonado

From: Office of the Clerk, District of New Mexico

CM/ECF Support Number: (505) 348-2075

CM/ECF Support Email: [cmecf@nmd.uscourts.gov](mailto:cmecf@nmd.uscourts.gov)

Number of Pages (including cover sheet): 6

Comments: Case#2:23-cv-00687-JB-KBM Document#1 Filed:09/22/2023

Job: ed2ac411-90ae-48fd-bdda-66cddb700f8f

\*\*\* NOTICE TO ATTORNEYS \*\*\*

IMPORTANT: If you are an attorney of record on an active case and have not registered for a CM/ECF account, you need to do so now. Failure of an attorney to register in a timely manner will result in the issuance of a Notice of Deficiency in each of your cases. When reasonable attempts have been made by the Court and you still fail to register, the Court will discontinue the printing and mailing of case documents and corresponding attachments to you. You may obtain a registration form and information from our website at <https://www.nmd.uscourts.gov>.

The court will only print and mail documents to pro se parties and other individuals exempted from the mandatory e-filing requirements.



Steven Maldonado  
v.s. Plaintiff

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEW MEXICO  
2023 SEP 20  
CLERK-LAS CRUCES

MTC. Chaplin Townson  
Defendant

## Plaintiff's Notice to the Court

IT COMES NOW: I Steven Maldonado  
the Plaintiff came to A Agreement to  
Settle out of the Honorable Court on 8-22-23  
I typed ~~and~~ Notarized Agreement And Hand  
Deliver on 9-13-23. The Agreement to Warden  
Rios. Per the Agreement type by the  
Plaintiff=Drop all investigations and this Case  
23-687JB-KB-M As part of this Agreement  
the Warden Rios will be opening investigation  
on Chaplin Townson and other Otero County  
Prison Staff and Allow me a call to the State Police  
to Report Officers and other Staff Misconduct  
of the Warden Rios in Las Cruces

Please Add Management Training Corp,  
Tresessa Anderson, Mr Montez; Capt Ochoa  
Warden Rios

See back  
for 2



Page 2

## TERMS

Term two: ~~the~~ Minime amount two Million dollars ~~to~~ be put in a New Inmate Support Group, Inmate Trust Account Called A Helping hand Drug Recovery. A Religious non profit that Registered with the IRS And M.T.C. can write it off ~~on~~ there tax for a Refund, and call it a Donation, For my ESN# go to [www.gofundme.com/a-helpinghandDrugRecovery](http://www.gofundme.com/a-helpinghandDrugRecovery) or Steven Maldonado on Facebook.Com.

Term three: For The Plaintiff is to Remain being held in the Custody of the Otero County Prison and not to be Transford out of OC PF Custidy

Term four Violating any of the term void this Agreement, And the Plaintiff would not be Legaly Bond to the legal Binding Contract.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places, and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.) The False statements they charged me when they had no Victims Statement ~~at~~ only the made up statement of the Officer working Education

Claim II: Mar Cardona made a modified statement  
naming me the Aggressor and committing Perjury  
with Hector J.R. Montez Refuses to take Action on her,  
and on this check Deny me my Legal Right / my Constitution Rights  
Supporting Facts:

Claim III: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Supporting Facts:

**D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF**

1. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to the conditions of your imprisonment? \_\_\_\_ Yes \_\_\_\_ No. If your answer is "Yes," describe each lawsuit. (If there is more than one lawsuit, describe the additional lawsuits using this same format on a blank sheet which you should label "E. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF.")

a. Parties to previous lawsuit:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

b. Name and location of court and docket number \_\_\_\_\_

c. Disposition of lawsuit. (For example, was the case dismissed? Was it appealed?  
Is it still pending?)  
\_\_\_\_\_

d. Issues raised: \_\_\_\_\_

e. Approximate date of filing lawsuit: \_\_\_\_\_

f. Approximate date of disposition: \_\_\_\_\_

2. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part D. \_\_\_\_ Yes \_\_\_\_ No.

If your answer is "Yes," briefly describe how relief was sought and the results.

3. I have exhausted available administrative remedies. \_\_\_\_ Yes \_\_\_\_ No. If your answer is "Yes," briefly explain the steps taken. Attach proof of exhaustion. If your answer is "No," briefly explain why administrative remedies were not exhausted.

**E. PREVIOUSLY DISMISSED ACTIONS OR APPEALS**

1. If you are proceeding under 28 U.S.C. § 1915, please list each civil action or appeal you have brought in a court of the United States while you were incarcerated or detained in any facility that was dismissed as frivolous, malicious, or for failure to state a claim upon which relief may be granted. Please describe each civil action or appeal. If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on a blank sheet which you should label "F. PREVIOUSLY DISMISSED ACTIONS OR APPEALS."

a. Parties to previous lawsuit:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

b. Name and location of court and docket number \_\_\_\_\_

c. Grounds for dismissal: ( ) frivolous ( ) malicious ( ) failure to state a claim upon which relief may be granted.

d. Approximate date of filing lawsuit: \_\_\_\_\_

e. Approximate date of disposition: \_\_\_\_\_

2. Are you in imminent danger of serious physical injury? \_\_\_\_ Yes \_\_\_\_ No. If your answer is "Yes," please describe the facts in detail below without citing legal authority or argument.

**G. REQUEST FOR RELIEF**

I request the following relief: 3 Million Dollars / The Wardens and there legal Counsel Sign the Plaintiffs Agreement that was ~~not~~ typed up on 9-13-23.

**Prisoner's Original Signature**

**Original signature of attorney (if any)**

\_\_\_\_\_  
\_\_\_\_\_

**Attorney's full address and telephone**

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained in the complaint is true and correct. 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Executed at \_\_\_\_\_ on \_\_\_\_\_  
(location) (date)

**Prisoner's Original Signature**

State of New Mexico  
County Doña Anna  
United States District

Steven Maldonado

vs.

M.T. Corp, Chaplain Townson, Capt. Choe,  
Warden Rios, Mr Montez, De Torres,  
Medical Dept, Mrs. Cardona Etc.

### Amendment to Add the Bill of Rights

It comes now:

I Steven Maldonado The Plaintiff quest this  
Honorable Court to Allow me to Add Violations  
of the bill of Rights<sup>#4</sup> which states / Protects ~~Chaplain~~  
<sup>Chaplain</sup> Townson is Denying me ~~my right~~ that all men have  
a indefasible Right to warship Almighty God  
according to the dictates of their own Conscience;  
That no person can ever be hurt, Molested or  
Restrained in his profession if it dont disturb  
others in thair Religous warship; And that all  
Christians shall be Protected and none  
oppressed, And that no person ~~on account~~ <sup>be Stopped</sup> or Retekated  
for His Religous opinions ~~shall~~ be Rendered  
ineligible to any office in the ~~Chaplain~~ Chaplain Townson  
~~Atoroo~~ County Prison Facility is doing to me  
and others also Violating the Freedom of  
Religion Act Also the First Amendment of the  
United States Constution.

cc: Christina Goochie

United States District

Respectfully,

Steven Maldonado



Terms of Agreement to  
Dismiss Violation  
of the Agreement.

I. To be Able to State The Overcomer  
Support Group on 10-25-23 For 4  
Years I will be p with ECHO  
Peer educator Enrique Moreno;  
Ben Aguilar; To be granted a  
42,000 dollar budget for work books  
And Supplies to start this much  
Needed Group which I would  
like to start the Over Comer Religion  
that Christian Faith <sup>Per</sup> which the Freedom  
of Religion Act and the bill of Rights #4  
Which to this day Warden Simmons/  
Chaplain Townson still violate.

# TERM OF AGREEMENT

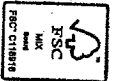
## By The Plaintiff

---

(I.) To be Able to Start Teaching Amentally  
in My owe Christian Religion. A ~~see~~  
Right found in the Freedom of Religion  
Act and also in the Bill of Rights #4  
which to this day Chaplain Townson  
is still violating not just on me but all  
Religion which Warden Simmons is  
Allow because they are both Black, I fell  
~~The Blacks they help, This is to be~~

II.

35 FIRMLY TO SEAL



PRESS FIRMLY TO S



**FP** **US POSTAGE**  
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EP14W June 2020  
OD: 12.5 x 9.5

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10 Mc Gregor Range Rd  
Cheparral NM 88081

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United States District  
200 E Griggs Ave  
Los Cruces NM 88001

All documents for case  
23-cv-687-JB-KMB



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